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7 Attorneys for Non-Party Objectors
FINANCIAL RECOVERY SERVICES.
8 INC., d/b/a FINANCIAL RECOVERY
STRATEGIES
9

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION
12

13 IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION,

Master File No. CV-07-5944-JST
MDL No. 1917

14
15 CLASS ACTION

16 This Document Relates to:
All Indirect Purchaser Actions

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18 DECLARATION OF JENNY S. YELIN
IN SUPPORT OF ADMINISTRATIVE
MOTION TO EXTEND TIME TO
FILE RESPONSE TO IPPS' MOTION
FOR RECONSIDERATION AND
SPECTRUM'S LETTER RE LATE
CLAIMS
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20 Judge: Hon. Jon S. Tigar
Date: October 23, 2019
Time: 2:00 p.m.
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Case No. CV-07-5944-JST

DECL OF JENNY S. YELIN ISO ADMINISTRATIVE MOTION TO EXTEND TIME TO FILE RESPONSE TO
IPPS' MOTION FOR RECONSIDERATION AND SPECTRUM'S LETTER RE LATE CLAIMS

1 I, Jenny S. Yelin, declare:

2 1. I am an attorney duly admitted to practice before this Court. I am an
 3 associate in the law firm of Rosen Bien Galvan & Grunfeld LLP, counsel of record for
 4 Plaintiffs. I have personal knowledge of the facts set forth herein, and if called as a
 5 witness, I could competently so testify. I make this declaration in support of
 6 FINANCIAL RECOVERY SERVICES. INC., d/b/a FINANCIAL RECOVERY
 7 STRATEGIES' ("FRS") Administrative Motion to Extend Time to File Response to IPPs'
 8 Motion for Reconsideration and Spectrum's Letter re Late Claims.

9 2. September 30, 2019 and October 1, 2019 are Jewish Holidays and FRS's
 10 primary contact and primary attorneys in our firm will be unavailable.

11 3. On September 24, 2019, my colleague Jeffrey Bornstein and I communicated
 12 separately with Kassra Nassiri, the attorney for Spectrum Recovery, LLC, and with Mario
 13 Alioto and Lauren Capurro, the attorneys for IPPs, regarding our requested extension of
 14 time to October 3, 2019 at 1:00 p.m. to file a response to IPPs' Motion for Reconsideration
 15 (ECF No. 5587) and Spectrum's letter brief regarding late claims (ECF No. 5588). Mr.
 16 Nassiri informed us that Spectrum was willing to sign a Stipulation and Proposed Order
 17 requesting the short extension of time, and informed us that we could represent to the
 18 Court via this Administrative Motion that Spectrum does not oppose the extension of time.
 19 Mr. Alioto and Ms. Capurro declined to sign a Stipulation and Proposed Order, but
 20 informed us that they did not oppose our request for an extension.

21 4. If the Court declines to grant the requested extension, FRS may not be able
 22 to prepare an adequate response to the issues in the Reconsideration Motion and the
 23 Spectrum Letter, given the upcoming Jewish Holidays. FRS has not previously sought any
 24 time modifications from the Court in this case. The requested extension would have no
 25 impact on the schedule for the case, because IPPs have represented that they intend to
 26 include any response to FRS's papers in the Reply in support of their Reconsideration
 27 Motion, which they will file on October 7, 2019. To the extent IPPs are not able to prepare
 28 a response to FRS's filing prior to their Reply date, FRS will not oppose an extension of

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1 time for IPPs to file a Supplemental Reply prior to the hearing date.

2 I declare under penalty of perjury under the laws of the United States of America
3 that the foregoing is true and correct, and that this declaration is executed at San Francisco,
4 California this 24th day of September, 2019.

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/s/ Jenny S. Yelin

Jenny S. Yelin

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